

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Joint Administration Requested)

**NOTICE OF APPEARANCE OF
BANK OF AMERICA, N.A., AS PREPETITION ABL AGENT,
AND REQUEST FOR SERVICE OF NOTICES AND PAPERS**

PLEASE TAKE NOTICE that the undersigned hereby enter their appearance on behalf of Bank of America, N.A., in its capacity as administrative agent and collateral agent (the “Prepetition ABL Agent”) under the *Second Amended and Restated Credit Agreement* dated as of April 30, 2024 and, pursuant to section 1109(b) of chapter 11 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the “Bankruptcy Code”) and rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), request that they be added to the service lists in the above-captioned chapter 11 bankruptcy cases (the “Cases”) and that copies of all notices, motions, pleadings (courtesy copies), subpoenas (courtesy copies), and other papers filed or served in these Cases be served upon them at the following addresses:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

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PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in Bankruptcy Rules 2002, 3017, 4001, 9007, and 9010(b), but also includes, without limitation, any plan of reorganization and objections thereto, notices of any orders, pleadings (courtesy copies), subpoenas (courtesy copies), motions, applications, demands, hearings, requests or petitions, disclosure statements, answering or reply papers, memoranda and briefs in support of any of the aforementioned and any other documents brought before this Court with respect to these Cases, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, email, delivery, telephone, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that nothing in this notice of appearance and request for service of notices and papers (this “Notice”) is intended to, or does, (i) authorize the undersigned to accept service of any subpoena or pleading on behalf of the Prepetition ABL Agent or (ii) waives the Prepetition ABL Agent’s rights to proper formal service pursuant to Bankruptcy Rules 7004 and 9016 (and Federal Rules of Civil Procedure 4 and 45) or any other applicable rules or statutes.

PLEASE TAKE FURTHER NOTICE that neither this Notice nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to be a submission to the Bankruptcy Court's jurisdiction or a waiver of any of the rights of the Prepetition ABL Agent, including, without limitation, to (i) have final orders in noncore matters entered only after *de novo* review by a District Court judge, (ii) trial by jury in any proceeding so triable in these Cases or any case, controversy, or proceeding related to these Cases, (iii) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, setoffs, or recoupments to which the Prepetition ABL Agent is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

Dated: January 16, 2025
Wilmington, Delaware

Respectfully submitted,

REED SMITH LLP

By: /s/ Kurt F. Gwynne
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Counsel to Bank of America, N.A., as Prepetition ABL Agent

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of January 2025, I caused a copy of the foregoing *Notice of Appearance and Request for Service of Notices and Papers* to be filed and served via ECF Noticing to all parties receiving ECF Notices in these chapter 11 cases.

/s/ Jason D. Angelo
Jason D. Angelo (No. 6009)